

**RIGGS, ABNEY, NEAL, TURPEN, ORBISON & LEWIS**

A PROFESSIONAL CORPORATION  
ATTORNEYS AND COUNSELORS AT LAW  
THE PARAGON BUILDING, SUITE 101  
5801 BROADWAY EXTENSION  
OKLAHOMA CITY, OKLAHOMA 73118-7489  
(405) 843-9909  
FAX (405) 842-2913

GREGORY W. ALBERTY  
JACK R. ANDERSON  
THOMAS H. ASKEW  
RYAN J. ASHURK  
LEA K. BICALE  
DONALD M. BUCHANAN  
MELISSA A. BOWEN  
WILLIAM A. BOYLES  
RICHARD B. BOYLE  
KELLY L. BRATCHER  
H. JAMES BRIDGES  
PETER W. BRIDGICK  
SCOTT W. BYRD  
MICHELLE M. CARTER  
JILL L. CHASE  
MATTHEW P. CROUCH  
ROBERT P. DEAN  
TRIA LOUISE DIZ  
FRANCISCO LUIS DOHGO  
GLENN S. DORRIS  
JANET S. DUMONT  
RAL L. EDWARDS JR.  
GEORGE M. EBERSON  
JEFF H. FUGATE  
RICHARD A. GAINI  
DAIT T. GARDUCCI  
RICHARD T. GARRIN  
O. SHARON GENTRY  
JANICE A. GRAHAM  
STEPHEN E. HALE

MELVIN C. HALL  
SHARON E. HANNA  
ZACHARY R. HANIS  
CHRISTOPHER S. HEROUX  
MOLLY M. HILLENMAN  
ERIK S. HOUCHOFF  
ROBERT E. HOWARD  
WM. GREGORY JAMES  
STEVEN JARSTEVSKI  
MEMORIAL L. JONES  
SAMAH G. KIELY  
SCOTT E. KIRLEY  
CHRISTOPHER E. KOEPEL  
TERRY D. KORDUSKI, II  
C. DAVID LEE  
NICHELLE D. LEFLORE  
JOSEPH P. LEHRANT  
TYLER D. LEONARD  
MICHELLE L. LESTER  
C. S. LEVINO, III  
MARY JEAN LITTLE  
GEOFFREY M. LORIS  
ADRIANA LOPEZ KUPPER  
LORI Y. LOVONIEVES  
JOHND LUTON  
JANET G. MALLORY  
JOHN ROSS MALOW  
KATT D. MATTHESON  
GLOYD L. MCCOT

RAYMOND A. NELSON  
DAVID J. NICHOLAI  
RICHARD A. NICHOLAI  
OUSAR MOKHEDJEMAI  
J. LYNN MOREHEAD  
JANICE LOGAN MORROW  
ROBERT A. NANCE  
DAVE L. NEAL  
MARK L. NELSON  
MARGARET A. NUNNERY  
JAMES C. ORBISON  
MICHAEL J. PETTY  
WHITNEY D. PETTY  
JAMES R. POLAK  
RICHARD P. POORMON  
DAVID L. PRICE  
VICTORIA L. RACKLEY  
FREDERICK JR.  
LISA R. RIGGS  
M. DAVID RIGGS  
STEPHEN D. RILEY  
RANDALL A. RICHQUEST  
RODNEY D. ROBERTS  
MARY J. ROBERTS  
WILLIAM C. SEARCY  
KRISTINE E. SHELINGTON  
DAVID A. SHAMMENTAL  
ROBERT P. SKEITH  
KEITH M. SMITH

SCOTT D. SMITH  
PETTY J. SOMMARS  
BEVERLY A. STEVART  
CHRISTOPHER B. SWANSON  
STEPHANE L. THEBANI  
DAVID H. THOMAS  
HARLEY W. THOMAS  
REX W. THOMPSON  
EDUARD TREI  
MICHAEL C. TURPEN  
PHILIP J. VASCOVICI  
LINDA VAN ARKEL-GREUBEL  
KATHY CANDE WALSHE  
SHARON K. WEAVER  
JOSEPH R. WELLS  
BRIAN S. WILKINSON  
DOUGLAS A. WILSON  
JERRY L. WITT  
COURTNEY M. WOLFE  
MICHAEL P. WOLACK  
GARY W. WOOD  
TRACY S. ZAHN

OF COUNSEL  
BENJAMIN P. ABNEY  
E. BRYAN HENSON

November 16, 2006

Theresa Noble Hill, Esq.  
Rhodes Hieronymus  
ONEOK Plaza  
100 W. 5<sup>th</sup> Street, Suite 400  
Tulsa, OK 74103-4287

Via Email

Re: *State of Oklahoma v. Tyson, et al.* N.D. Okl. No. 4:05-cv-00329 TCK-SAJ

Dear Theresa:

I am writing in response to your letter of yesterday, and our conversation later yesterday afternoon. For the Oklahoma Department of Environmental Quality production scheduled on November 27, 2006, the State will make a good faith effort to identify, by request for production number, documents or groupings of documents which are responsive to Cargill, Inc's and Cargill Turkey, LLC's Requests for Production. This is done as a courtesy to you and does not represent a commitment on the State's part to do so in future document productions.

We will try to identify, where possible, boxes which contain responsive information. However, the documents have been pulled by division and program within DEQ as they are kept in the usual course of business. The State cannot segregate documents which are responsive to Cargill from documents which may be responsive to other requests or interrogatories. We will be providing an index of the documents that have been pulled and each box contains a list of the files that are contained within

We do want to point out that because many of your requests are so broad, our review indicates that every document that has been pulled so far could be responsive to one or more requests for production. We are going above and beyond by trying to identify for your ease of inspection documents which are responsive to your requests

Sincerely yours,



Robert A. Nance  
For the Firm

cc: Trevor Hammons, Esq

TULSA • OKLAHOMA CITY • MUSKOGEE • DENVER



## Bob Nance

---

**From:** Trevor.Hammons@oag.ok.gov  
**Sent:** Monday, March 19, 2007 9:43 AM  
**To:** Bob Nance  
**Subject:** Fw: Letter re document production

J. Trevor Hammons  
Oklahoma Office of the Attorney General  
Environmental Protection Unit  
313 N.E. 21 St.  
Office: (405) 522-2801  
Fax: (405) 522-0608

**CONFIDENTIALITY NOTE:**

This e-mail message is intended for the personal use of the recipient(s) named above. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately and delete the original message.

----- Forwarded by Trevor Hammons/OAG on 03/19/2007 09:37 AM -----

"Theresa Noble Hill" <THill@rhodesokla.com>

To "Bob Nance" <rnance@riggsabney.com>, <Trevor.Hammons@oag.ok.gov>

cc "Michelle Bryce" <mbryce@rhodesokla.com>, "John Tucker" <jhtucker@rhodesokla.com>, "Candy J. Smith" <CSmith@rhodesokla.com>.

11/16/2006 09:22 AM

"Mann, Dara D" <DMann@faegre.com>

Subject RE: Letter re document production

Bob,

Thank you for the letter. We will not file anything with the Court. I will discuss with my co-counsel.

I would suggest/request that we look at our calendars to see if there is a time next week to discuss any remaining agency document issues and the additional issues addressed in my letter dated November 9, 2006.

Theresa

-----Original Message-----

**From:** Bob Nance [mailto:rnance@riggsabney.com]  
**Sent:** Thursday, November 16, 2006 9:07 AM  
**To:** Theresa Noble Hill; Trevor.Hammons@oag.ok.gov  
**Subject:** Letter re document production

Theresa, here is the letter you requested yesterday.

3/19/2007

<<Discovery ltr to Hill 111606.pdf>>

Robert A. Nance  
RIGGS, ABNEY, NEAL, TURPEN,  
ORBISON & LEWIS  
5801 Broadway Extension, Suite 101  
Oklahoma City, OK 73118  
Telephone: (405) 843-9909  
Facsimile: (405) 842-2913  
rnance@riggsabney.com

=====

**Confidentiality Notice:** The information contained in and transmitted with this communication is strictly confidential, is intended only for the use of the intended recipient, and is the property of Riggs, Abney et al. Law Firm or its affiliates and subsidiaries. If you are not the intended recipient, you are hereby notified that any use of the information contained in or transmitted with the communication or dissemination, distribution or copying of this communication is strictly prohibited by law. If you have received this communication in error, please immediately return this communication to the sender and delete the original message and any copy of it in your possession.

=====

3/19/2007